



**Intercontinental Terminals Company (ITC) Fire Morning Update
Deer Park, Texas
April 1, 2019 0000 – April 1, 2019 1159**

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities

conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- The Environmental Protection Agency (EPA) continues to participate in Unified Command with Texas Commission on Environmental Quality (TCEQ), Harris County Pollution Control Services, and ITC.
- The number and amount of benzene detections has decreased steadily throughout the day, due to the ongoing removal of product from tanks and the tank farm, as well as the continued use of foam as needed.
- The Executive Director of the TCEQ (Toby Baker), as well as the Commander of the United States Coast Guard (USCG) 8th District (Paul Thomas), and acting EPA Regional Administrator David Gray visited the site on April 1, 2019 to discuss transitioning, end points, and resource needs.
- Flushing in ditches was conducted on April 1, 2019, on the southside of Tidal Road near the coffer dam and the Clean Harbors facility, as well as upper Tucker Bayou to help keep the benzene levels minimal in that area.
- The Shoreline Cleanup Assessment Team (SCAT) and endpoints plans were provided to Unified Command for comments on April 1, 2019.
- The Equipment decontamination plan has been provided for comment.
- On April 1, 2019, pumping into the 57,000-barrel (bbl) barge docked at ITC from waste storage tanks began.
- On April 1, 2019, Harris County Pollution Control announced they will hire a contractor to conduct soil sampling along Independence Parkway, and Tidal Road to help facilitate the reopening of the roads to public traffic.
- On April 1, 2019, ITC requested to utilize outfall 005 to drain the noncontact stormwater from the base oil tank farm that lies right along Tucker Bayou. EPA and TCEQ discussed with TCEQ management, who agreed to plan, as long as ITC samples the water (using their normal noncontact protocol) and the discharge will not affect operations on Tucker Bayou (ITC will work with EPA and USCG early on April 2 on approval of this issue). TCEQ and EPA received the sampling results early on April 2, 2019; both Chemical Oxygen Demand (COD) and pH are within their permitted limits.
- On April 1, 2019, ITC announced a frac tank manifold and vacuum truck unloading area is being constructed. 4-500 bbl frac tanks will be connected in series, which will allow for 4-70 bbl or 130-bbl vac trucks to unload at the same time to the frac tank system.
- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted surface water sampling on April 1, 2019, at 10 sample locations. The surface water samples were collected along Buffalo Bayou and the San Jacinto River, and will be analyzed for Per- and polyfluoroalkyl substances (PFAS), Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), COD, and Oil & Grease.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft found no exceedances of the Texas comparison values on April 1, 2019, during Flight 17. ASPECT has conducted a screening level assessment to evaluate the unreported or undetected releases of hazardous materials or contaminants at the ITC in Deer Park, Texas. The screening level results from ASPECT were compared to the ASPECT list of TCEQ short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs. No chemicals were detected by the ASPECT.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 1, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the TCEQ short-term AMCVs and found no exceedances of the short-term AMCVs for toluene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 ppm) and xylene (1.7 ppm). These exceedances of the short-term AMCV for benzene and xylene have been shared with unified command and local officials.

- EPA conducted handheld air monitoring on April 1, 2019 (from midnight to 11:59 pm), at 61 locations. Results were reported above the detection limit at seven locations for total VOCs. Benzene was detected above the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Value (AMCV) (0.18 ppm) at three locations. EPA will conduct additional air monitoring and deploy the TAGA to determine if the short-term AMCV for benzene continues to be exceeded.
- ITC continued air monitoring on April 1, 2019, (from midnight to midnight); there were 3,825 VOC readings (627 detections) with and 2,720 benzene readings (445 detections).
- TCEQ continued handheld air monitoring on April 1, 2019 (from 12:00 am to 10:00 pm); approximately 166 readings were taken. No readings above the Unified Command action level were detected.
- As of 7:00 pm on April 1, 2019, ITC had deployed 118,300 feet of boom, 61,807 bbl of product/water were recovered from water operations, 92,222 bbl of product/water were recovered from the tank farm, approximately 465,000 gallons of foam concentrate were used for fire-fighting/suppression and emission suppression, and 960 people were working on-scene.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on 24-hour basis.

Tank Status	Tank No.
Complete	80-2, 80-3, 80-7, 80-10, 80-12, 80-13, 80-14, 80-15
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-9, 80-11

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	12	8	20
EPA Non-Region 6	0	3	3
START	1	14	15
Other Contractors	0	8	8
Total	13	33	46

Additional Information: Air Monitoring and Water Sampling locations:

